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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE  
MEMORIAL HOSPITAL, INC. (doing  
business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
TIME FOR RESPONSE TO AMENDED  
THIRD-PARTY COMPLAINT AND  
COUNTERCLAIMS  
(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Counter-Defendant (Navajo Health Foundation – Sage Memorial Hospital, Inc.), Third-Party Defendants (Christi El-Meligi and Netrishia Dalgai) and Counter-Claimant (Razaghi Development Company, LLC or "RDC")) hereby stipulate to permit Counter-Defendant and Third-Party Defendants additional time, to and until September 25, 2020, to respond to the Amended Third-Party Complaint and Counterclaims asserted by RDC on September 1, 2020. *See* ECF No. 92. The parties respectfully request the Court approve this stipulation. This is the parties' first stipulation for the purpose set forth herein. In requesting the Court approve this stipulation, the parties rely upon the following:

1. Counter-Claimant RDC filed a Third-Party Complaint and Counterclaim on July 23, 2020. *See* ECF No. 67. By Order filed August 25, 2020, Counter-Defendant and Third-Party Defendants were required to file a response to those claims on September 4, 2020. ECF No. 87. However, prior to that deadline, RDC filed an Amended Third-Party Complaint and Counterclaims. This amended filing renders the September 4, 2020 deadline moot.

2. The parties have communicated regarding this matter. Paul S. Padda, Esq., counsel for Third-Party Defendants and the Counter-Defendants, has communicated his upcoming work schedule (which includes out-of-town travel) and the parties are in agreement that permitting additional time, up to and including September 25, 2020, for Third-Party Defendants and Counter-Defendant to respond to RDC's amended pleading is appropriate.

3. The parties agree that the Third-Party Defendants and Counter-Defendants' response to the original Third-Party Complaint and Counterclaim (filed on July 23, 2020) is rendered moot by the amended pleading filed by RDC on September 1, 2020.

4. The parties respectfully request the Court approve this stipulation.

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/s/ Kris Leonhardt

Pavneet S. Uppal, Esq.  
Kris Leonhardt, Esq.  
Brian L. Bradford, Esq.

*Counsel for Razaghi Development Company, LLC*

Dated: September 4, 2020

/s/ Paul S. Padda

Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.

*Counsel for Christi El-Meligi,  
Netrishia Dalgai and Navajo Health  
Foundation – Sage Memorial  
Hospital, Inc.*

Dated: September 4, 2020

**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED:** September 8, 2020